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**BY ECF**

The Hon. Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Gilbert v. Azure Power Global Limited, et al.*, case no. 1:22-cv-07432-GHW

Dear Judge Woods:

We write on behalf of lead plaintiff movant Eric Webb in the above case.

On December 2, 2022, Mr. Webb and his undersigned counsel filed a letter in this action regarding competing lead plaintiff movant Serap Lokman's "tourist" visa she first asserted on reply. Dkt. No. 34; *see also* Dkt. Nos. 31 at 12 and 32 ¶ 2.

After Mr. Webb and his undersigned counsel filed the earlier letter, counsel for Ms. Lokman sent counsel for Mr. Webb a picture of her visa showing that she has a B-1/B-2 business and tourist visa. As such, much of the concerns from the earlier letter focused on Ms. Lokman's ability to obtain a correct visa are answered.

While certain issues raised in the earlier letter remain<sup>1</sup> and substantial issues regarding Ms. Lokman's adequacy and typically remain,<sup>2</sup> due to the fact that Ms. Lokman holds a B-1/B-2 business and tourist visa instead of a "tourist" visa as she previously stated, Mr. Webb and his undersigned counsel withdraw the earlier letter (Dkt. No. 34).

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<sup>1</sup> *See* Dkt. No. 34 at 2 n. 4 (citing <https://travel.state.gov/content/travel/en/us-visas/tourism-visit/visitor.html> ("A visa allows a foreign citizen to travel to a U.S. port-of-entry (generally an airport) and request permission to enter the United States. ***A visa does not guarantee entry into the United States.***") (Emphasis added.)).

<sup>2</sup> *See* Dkt. Nos. 28 at 3-6, 29 at 2-4, and 33 at 2-3.

Respectfully submitted,

/s/ Phillip Kim (PK 9384)  
Counsel for Eric Webb

cc: All counsel via ECF